

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TAKISHA REID,

Plaintiff,

-against-

20 CV 3926 (PK)

THE CITY OF NEW YORK,
NYPD OFFICER GREGORY HOWARD,

Defendants.

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**PLAINTIFF'S LOCAL RULE 56.1 COUNTER-STATEMENT IN OPPOSITION
TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

1. Plaintiff Takisha Reid (hereinafter “Ms. Reid”) is a plaintiff in this lawsuit and worked as a Confidential Informant (“CI”) for the NYPD. *Defendant City’s Local Rule 56.1 (“City L.R.”) ¶1.*
2. Defendant Gregory Howard (“Howard”) was a detective with the defendant City of New York’s (“City”) NYPD from at least 2017-2019. *City L.R. ¶2*
3. Howard signed up Ms. Reid as a CI and had her complete paperwork. *See Exhibit D, Howard’s Deposition (“Exhibit D”) at p. 29:16-21, 30:1-10.*
4. Howard used his personal cell phone to communicate with Ms. Reid because his department phone was broken. *Exhibit D at p. 97.*
5. Howard met Ms. Reid at the precinct to discuss her CI role. *Exhibit D, p. 37:8-12, p. 38:5-9, p. 39-40: 20-12.*

6. Howard took the Fifth Amendment when questioned about himself and Ms. Reid about the following:
 - a. Sexual relations. *Exhibit D p. 43.*
 - b. Sexual encounters. *Exhibit D p. 45.*
 - c. Difference between rape and consensual sex. *Id.*
 - d. Sexual overtures or romantic relationship. *Exhibit D p. 46.*
 - e. Sex inside a car. *Exhibit D p. 56.*
 - f. Sex outside car, motel, bar, house/home, apartment/trailer. *Exhibit D p. 57.*
7. The City disciplined Howard for his encounter with Ms. Reid. *City L.R. ¶15.*
8. Howard asked Ms. Reid to be his CI and it was Howard's idea. *Ms. Reid's Deposition Exhibit E ("Exhibit E").*
9. Ms. Reid and Howard communicated by phone, messages and through social media. *Exhibit E p. 31:9-24.*
10. Ms. Reid made complaints of rape, sexual assaults, and Howard's threats. *Exhibit E p. 38 5-10, 4014-20, 46:1-14, 51:10-25.*
11. The IAB investigation made Ms. Reid uncomfortable because of their insensitivity. *Exhibit E p. 39.*
12. Howard's attorney made equally insensitive remarks about rape when Ms. Reid was questioned about rape. *Exhibit E p. 55:11-25, 56:10-25.*
13. Ms. Reid was paid for her work as CI through Crime Stoppers a unit of the NYPD/City. *Exhibit E p. 65:7-16.*

Dated: June 8, 2023
New York, New York 10007

Vik Pawar (VP9101)